

PUBLIC COMMENT
DWR Draft GSP Emergency Regulations Public Comment
March 25, 2016

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COMMENT for Section 354.10 Notice and Communication

Success in implementing and maintaining groundwater sustainability in California's water basins is very much dependant on the commitment of stakeholders and the public living in each region. The current draft Section 354.10 titled Notice and Communication focuses on agency public meetings, an internal accounting of beneficial uses and user of groundwater in the basin, process and engagement of stakeholders and a written description of local agencies and public roles and responsibilities. Each of these working tasks is necessary. More details, however, are needed in this section. Communication and outreach during the life-cycle of the Sustainable Groundwater Management Act (SGMA) and the Groundwater Sustainability Plan implementation period is not addressed. I understand the Draft Groundwater Sustainability Plan is a work in progress and applaud all efforts that have moved us to today's Draft document.

The life-cycle of SGMA and a Groundwater Management Plan will likely progress through a design phase, an implementation step and a long maintenance period. Each phase requires a different set of communication and outreach. Operation Unite® suggests the Emergency Regulations address communication and outreach according to these working phases.

Operation Unite® suggests adding communication plans for the following phases:

- Design of the Groundwater Management Plan (GSP)
- Implementation and Achievement of the Sustainability Goal
- Maintaining of the Sustainability Goal

The public living within the basin boundaries and the special interest stakeholders (e.g. irrigation districts, municipalities) will need different types of communication and outreach. Operation Unite® suggests each phase of the communication plan address the public and stakeholders, specifically.

COMMENT for Section 354.18 Water Budget

Water budgets for basins will be assuming groundwater flow conditions entering from outside the boundaries of the basin.

1. What level of responsibility will out-of-watershed areas have in managing the underflow traveling into an adjacent, GSA regulated water basin?
2. How will this be articulated in a GSP?

COMMENT for Section 354.16 Basin Conditions

SGMA states in Section 10727.2 (b)(1) Measurable Objectives that sustainability goals in a basin are to be achieved within 20 years of the implementation of the plan. Sustainable yield is defined by SGMA as the maximum quantity of water, calculated over a base period representative of long-term conditions in the basin and including any temporary surplus that can be withdrawn annually from a groundwater supply without causing an undesirable result.

A fundamental difficulty is standardizing the determination of the "base period." Each basin is different with respect to water demand, social pushback, potential aquifer storage capacity and water recharge variability. The range of possible "basin periods" will vary. Some basins will have few choices, others many.

1. How is "base period" discussed in the GSP? It seems that this topic belongs in Section 354.16.